

Dear Mr. Gallagher,

I am concerned about the increasing levels of persistent toxic chemicals, such as mercury, dioxin, and flame retardants that are found in our bodies and the environment, and I urge you to issue a strong rule for the Persistent Bioaccumulative Toxics (PBT) Program.

Evidence shows that persistent toxic chemicals, such as mercury, PBDEs, and dioxins, are not going away. Recent studies have found these chemicals in our bodies, house dust, fish, and breast milk.

It is critical that the new rule strengthen the PBT Program's ability to safeguard public health and the environment. The PBT rule must:

- * Contain a broad list of persistent toxic chemicals to be phased out. This list must be based on science, not politics, and include chemicals that currently are a problem in Washington state or have the potential to cause a problem in Washington state.
- * Include phthalates on the list of chemicals to be phased out. These chemicals were recently linked to reproductive problems in male infants.
- * Incorporate the goals of Ecology's 2000 PBT Strategy, including more emphasis on preventing the use and release of persistent toxic chemicals.
- * Specifically incorporate the precautionary principle, which calls for taking action to prevent harm when the best scientific evidence available shows harm may occur.
- * Ensure that the goal of a phase-out plan (or chemical action plan) is to eliminate the chemical. Each phase-out plan must study and recommend safer substitutes to using the chemical and also include clear timelines for completion.

Also, it is an outrage that pesticides and fertilizers have been exempted from the rule. Ecology should request immediately that the Legislature remove the exemption for these dangerous chemicals so that they can be addressed as part of the PBT Program.

Sincerely